

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

JOHN A. SPERTUS, M.D.,

Plaintiff,

v.

Case No. 3:22-cv-00553-wmc

EPIC SYSTEMS CORPORATION,

Defendant.

UNOPPOSED MOTION TO MODIFY STIPULATED PROTECTIVE ORDER

Pursuant to Federal Rule of Civil Procedure 26(c), Defendant Epic Systems Corporation (“Epic”) requests that the Court modify the Stipulated Protective Order (Dkts. 59, 60) in order to memorialize the ability of Epic’s insurance carrier to view information designated by the parties as Highly Confidential-Attorneys’ Eyes Only and to retain and destroy such information consistent with their legal obligations. The proposed Stipulated Modified Protective Order is attached as Exhibit A. A redline showing the minor requested modifications is attached as Exhibit B. Counsel for Plaintiff John A. Spertus, M.D. has indicated that Plaintiff does not oppose the relief sought in this motion.

Accordingly, Epic respectfully requests that the Court enter the attached Stipulated Modified Protective Order.

Respectfully submitted this 1st day of August, 2023.

/s/ Bryce A. Loken
Kristin Graham Noel
Matthew J. Duchemin
Bryce A. Loken
QUARLES & BRADY LLP
33 East Main Street, Suite 900
Madison, WI 53703
Tel.: (608) 251-5000
Fax: (608) 251-9166
kristin.noel@quarles.com
matthew.duchemin@quarles.com
bryce.loken@quarles.com

Attorneys for Epic Systems Corporation